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STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
3100 Port of Benton Blvd • Richland, WA 99352 • (509) 372-7950

November 12, 2004

Ms. Stacy Charboneau
Richland Operations Office
United States Department of Energy
P.O. Box 550, MSIN: A5-11
Richland, Washington 99352

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EDMC

Dear Ms. Charboneau:

Re: Ecology Review Comments on the Engineering Evaluation/Cost Analysis for the
Plutonium Finishing Plant Above-Grade Structures

This letter transmits the Washington State Department of Ecology review comments (attached) for the above referenced Engineering Evaluation/Cost Analysis document. Should you have any questions regarding these comments, please contact me at 372-7881.

Sincerely,

Jeff Ayres
Environmental Scientist
Nuclear Waste Program

jma/nc

cc: Andrea Hopkins, FH
Stuart Harris, CTUIR
Pat Sobotta, NPT
Russell Jim, YN
Todd Martin, HAB
Ken Niles, ODOE
Administrative Record
Environmental Portal

**Washington Department of Ecology
Review Comments (11/10/04) for the
Engineering Evaluation/Cost Analysis for the Plutonium Finishing Plant Above-
Grade Structures**

Page	Comment	Response
1-2, Last Par, 2 nd Sent.	Delete sentence "Currently, there are no..."	
1-3, 1 st full Par	Reference closure plans for 241-Z	
1-3, Last Par, 1 st Sent.	Delete sufficiently and replace with "determined to be"	
T1-1, 241-Z	Footnote this as a TSD	
2-2, 2.1.1, Last Par, last Sent.	Change "...are scheduled to be..." to "...was completed..."	
2-3, 2.1.4, 2 nd Par.	What will be done with contaminated soils (put back in the ground)?	
2-4, 2.1.4 Last Par,	Are SHPO activities pending or in process?	
2-5, 2.2.1.1, 2 nd Par.	Delete this paragraph and anything on soil removal	
2-18, 2.3, 1 st Par	Delete information on the crib and soils	
2-18, 2 nd Par	Describe how the piping, etc. will be managed as RCRA debris and the disposal process	
2-18, Par 3	Reference the plan used to designate and dispose of the hazardous/mixed waste.	
T2-1,	Reference the Closure Plan in the footnotes	
T2-4, 241-Z	Check quantities (seems low) and the different waste types doesn't appear to be correct	
4-1, 4 th Par	Discuss other (IDF) disposal options	
4-2, 1 st Par, Next to last sent.	Change sentence to read "...or stored at CWC until it is properly treated for disposal."	
4-2, 3 rd Par, 3 rd Sent	Are ETF, CWC, LLBG, ERDF completely permitted or are the permits in process and they are working under final facilities status?	
4-2, 3 rd Par, Last Sent.	This sentence reads poorly and doesn't seem to make sense.	
4-5, 4.4, 1 st bullet	Reference a clean up standard (clean debris surface?)	
4-6, 1 st bullet	Reference ARAR for decontamination	
4-6, 5 th bullet	Reference WAC for waste disposal	
4-6, 7 th bullet	Describe "cover" (concrete poured over a slab for stability and safety?)	
4-6, 1 st Par,	Reference the Holdup Removal Plan	
4-6, 2 nd Par	Reference decontamination standards	
4-6, last Par, 1 st Sent	Delete word "grout"	
5-2, 3 rd Par, 1 st Sent	Sentence reads awkward, rewrite	
5-3, 5.1.2.1, 4 th Par	Reference asbestos disposal regs	
5-4, 5.1.3, Last Sent	Preface this sentence with "It is anticipated that there would..."	
5-5, 1 st Par, 1 st Sent	Delete word "barrier"	
T5-1, ARAR Table	Delete subsections in references, not all applicable ARARs are referenced.	